

From: Kawabata, Sylvia
Sent time: 01/31/2014 09:52:36 AM
To: Perkins, Brandon; Cardona, Tamara (DEC) <tamara.cardona@alaska.gov>; Adams, Lauri J (LAW) <lauri.adams@alaska.gov>; Stephanie Buss (b) (6)
Subject: RE: Regarding Sulfolane and the Request for Adjudicatory Hearing

Tamara – (b) (6) If you do need to reach me while
(b) (6) you can reach me at (b) (6)

Sylvia Kawabata

From: Perkins, Brandon
Sent: Friday, January 31, 2014 8:28 AM
To: Cardona, Tamara (DEC); Adams, Lauri J (LAW); Stephanie Buss
Cc: Kawabata, Sylvia
Subject: RE: Regarding Sulfolane and the Request for Adjudicatory Hearing

Hi Tamara

(b) (6) If you need any additional assistance please contact Sylvia.

Brandon Perkins
Office of Environmental Cleanup
U.S. Environmental Protection Agency, Region 10
206-553-6396

From: Cardona, Tamara (DEC) [<mailto:tamara.cardona@alaska.gov>]
Sent: Thursday, January 30, 2014 11:37 AM
To: Perkins, Brandon; Adams, Lauri J (LAW); Stephanie Buss
Subject: RE: Regarding Sulfolane and the Request for Adjudicatory Hearing

Lauri,
Please let us know if you have any questions on this.
Thanks Brandon!

Tamara

From: Perkins, Brandon [<mailto:Perkins.Brandon@epa.gov>]
Sent: Thursday, January 30, 2014 10:35 AM
To: Cardona, Tamara (DEC); Adams, Lauri J (LAW); Stephanie Buss
Subject: FW: Regarding Sulfolane and the Request for Adjudicatory Hearing

Hi Tamara

Here is the info you requested from EPA. Let me know if you need anything else.

Brandon Perkins
Office of Environmental Cleanup
U.S. Environmental Protection Agency, Region 10
206-553-6396

From: Bailey, Marcia
Sent: Thursday, January 30, 2014 9:25 AM
To: Perkins, Brandon
Subject: Regarding Sulfolane and the Request for Adjudicatory Hearing

At your request and to continue with our support of the Alaska Department of Environmental Conservation I shared the "Notice of Request for Adjudicatory Hearing on ADEC's Conditional Approval of the Revised Human Health Risk Assessment, Flint Hills North Pole Refinery" with Dan Petersen, Ph.D., the chemical manager for sulfolane at EPA's Office of Research & Development. I particularly drew his attention to pages 25-27 in section 3, "The Cleanup Level Selected by DEC is not Supported By Best Current Science." In this section, the Requestor claims that EPA's use of the

no observed adverse effect level(NOAE) for sulfolane to determine its noncancer toxicity in the form of the reference dose is contrary to EPA's own guidance and practices. Specifically, the Requestor claims that EPA should have used a benchmark modeling approach using specific statistical techniques. The Requestor also takes issue with EPA's choice of an uncertainty factor to be applied in the derivation of the reference dose.

According to what Dr. Petersen related to me, the methodology ORD used for deriving a reference dose for sulfolane, which was done within the context of a Provisional Peer Reviewed Toxicity Value for Superfund (PPRTV,) is the standard methodology used by ORD for this purpose. The development of PPRTVs complies with Agency methodologies and practices for the development of toxicity values, including reference doses. He acknowledged that entities outside EPA as well as other programs within EPA may choose to follow alternative policies and practices and could thereby derive different reference doses for the same chemical. Nevertheless, the claims by the Requestor regarding the appropriateness of EPA's derivation of the reference dose for sulfolane as presented in the PPRTV are incorrect.